

FILED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FEB 12 2014

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO

UNITED STATES OF AMERICA,

Plaintiff,

v.

RONALD K. YORK,

Defendant.

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No.

4:14CR0030 HEA

INFORMATION

COUNT I

The United States Attorney charges that:

Between December 2008 and April 2009, in the Eastern District of Missouri,

RONALD K. YORK,

the defendant herein, together with B.M. and other unknown individuals, did knowingly conspire to commit the following offenses against the United States; to wit:

to knowingly present to the Department of Homeland Security and to the Department of Labor applications required by the immigration laws of the United States, or regulations prescribed thereunder, that is Petitions For Non-Immigrant Worker, (Form I-129) and Applications for Alien Employer Certification (Form ETA 750) and Temporary Employment Certification (Form 9142), which contained statements regarding the intention of defendant to solely employ the beneficiary aliens at Company A, which defendant then knew were false in that defendant intended to and did lease the beneficiary aliens for employment to Company B, in violation of Title 18, United States Code, Section 1546(a);

to knowingly hire for employment, during a 12-month period, at least ten aliens, knowing the aliens to be illegally brought to the United States and unauthorized for such employment, in violation of Title 8, United States Code, Section 1324(a)(3)(A).

All in violation of Title 18, United States Code, Section 371.

COUNT II

The United States Attorney further charges that:

On or about April 16, 2009, in the Eastern District of Missouri,

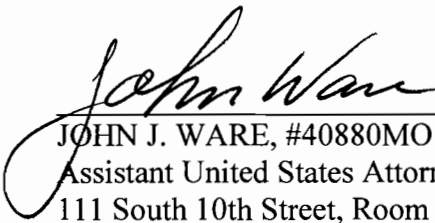
RONALD K. YORK,

the defendant herein, did knowingly engage in a monetary transaction by, through, and to Regions Bank, a financial institution, affecting interstate commerce, in criminally derived property of a value greater than \$10,000.00, that is a transfer of funds in the amount of \$13,262.49, such property having been derived from a specified unlawful activity, that is, the leasing for employment of unauthorized aliens obtained by false statements in applications required by immigration laws.

In violation of Title 18, United States Code, Section 1957(a) and punishable under Title 18, United States Code, Section 1957(B).

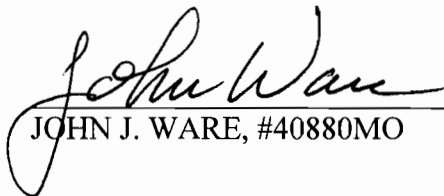
Respectfully submitted,

RICHARD G. CALLAHAN
United States Attorney


JOHN J. WARE, #40880MO
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(314) 539-2200


UNITED STATES OF AMERICA)
EASTERN DIVISION)
EASTERN DISTRICT OF MISSOURI)

I, John J. Ware, Assistant United States Attorney for the Eastern District of Missouri, being duly sworn, do say that the foregoing information is true as I verily believe.



JOHN J. WARE, #40880MO

Subscribed and sworn to before me this 5 day of January, 2014.



CLERK, U.S. DISTRICT COURT

By: 

DEPUTY CLERK